TRC

November 17, 2006

Ms. Donna L. Gaffigan, Case Manager
State of New Jersey
Department of Environmental Protection
Bureau of Case Management
401 East State Street
CN-028
Trenton, New Jersey 08625

Re: Draft Final 2006 Sediment Sampling Plan
Shieldalloy Metallurgical Corporation
Newfield, New Jersey
TRC Project No. 51903-SEDI-02015

Dear Ms. Gaffigan:

Attached please find two (2) copies of the Draft Final 2006 Sediment Sampling Plan for the Shieldalloy Metallurgical Corporation (SMC) facility located in Newfield, New Jersey. The information gathered during the described sampling activities is intended to support the finalization of the Surface Water and Sediment Feasibility Study (FS) as part of TRC Environmental Corporation's (TRC's) Exit Strategy® program at this site. The sampling will support an evaluation of potential changes to the environment of the Hudson Branch and, if any are identified, their impact on the preferred surface water/sediment remedial alternative previously selected on the basis of the 1996 Surface Water and Sediment FS. As such, the document includes a summary of the results of the RI and FS, including defined remedial goals, previous NJDEP comments on the FS and the intended means by which these comments will be addressed within the final FS and the associated remedial action.

A draft Sediment Sampling Plan was previously submitted for your review on August 22, 2006. TRC has revised the draft sampling plan based on discussions held between NJDEP, USEPA, Biological Technical Assessment Group (BTAG), TRC and SMC representatives during a project meeting held on October 12, 2006. A summary of the various items discussed, the resolution of these discussions, and how they were addressed in this draft final sampling plan are provided below.

- Item 1 – The NJDEP and BTAG would like to see additional downstream sediment samples collected. Potential locations that were mentioned include historic sample location SD-23 and one of the sample locations previously located within Burnt Mill Pond, as that location could be a potential sink for contaminants.

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Resolution – TRC has added sample location SD-23 to the scope of the sampling plan. The original pond samples were collected using a boat. As the use of a boat is not anticipated within the scope of this sampling plan, the collection of a sample from Burnt Mill Pond and a reference sample have been included in this sampling plan; however, the exact locations of these samples will be determined in the field to be consistent with the historic sample locations but located where the samples can be collected by hand without a boat (i.e., from the shoreline with an auger extension). The Burnt Mill Pond sample location will be located within the eastern portion of the pond, to be as consistent as possible with either previous sample location SD-25 or SD-26. The reference pond sample location will be located near the northern end of the pond, comparable to the original pond reference sample location SD-30. This change has been incorporated into Section 3.2 of the work plan as well as into Table 3-1. Please note that the original sediment sample collected at SD-9A was also collected with a boat and therefore the sample collected as part of this investigation will also be collected by hand from a location as consistent as possible with previous sample location SD-9A.

- Item 2 – EPA and NJDEP questioned why additional areas were not included in the sampling plan. Namely, the drainage ditch from the parking lot to the Hudson Branch (Outfall 003A), the drainage basin in the southwest portion of the site (Outfall 004A) and the thermal pond in the south-central portion of the site were all mentioned as potential sample areas. NJDEP also questioned whether drainage from the lime dust storage area may have impacted the thermal pond.
  Resolution: In general, there is no reason to suspect that the drainage ditch from the parking lot to the Hudson Branch or the existing drainage basin may be sources of sediment contamination. The basis for this statement has been provided in the text of the report (Section 1.3). Proposed Hudson Branch sediment sample locations SD-15-06 and SD-17-06 will provide information on sediment quality downstream of Outfalls 004A and 003A, respectively. With respect to the thermal pond, a more thorough discussion of the thermal pond and its characteristics has been incorporated into the plan. As the thermal pond is only intermittently inundated, it is unlikely to support aquatic organisms and therefore will be evaluated with respect to potential investigation as part of the soil sampling plan (to be submitted in the future, upon resolution of TRC's request for an alternate remedial criterion for beryllium), rather than within this sediment sampling plan.

- Item 3 – NJDEP questioned the lack of radiological sampling of the stream sediments.
  Resolution – Radiological sampling will be conducted in support of SMC's site-wide decommissioning process. The samples will be collected at select sediment sample locations concurrently with the sampling described in this Sediment Sampling Plan but the results will be addressed separately within the context of the decommissioning process.

- Item 4 – EPA questioned whether a wetland delineation/wetland assessment would be conducted.
  Resolution – While a wetland delineation was conducted prior to the preparation of the FS, a new wetland delineation will be required a part of the remedial action, due to the time that has passed since the original delineation. When implemented, the preferred remedial action will also include restoration of the wetland areas to be disturbed during remediation. This has been acknowledged in Section 2.4 of the sampling plan.

- Item 5 – EPA questioned as to whether a new risk assessment would be conducted.
  Resolution – Section 2.5 now describes the steps that will follow completion of the sediment sampling effort. As the intent of this plan is to define any changes in sediment quality over time that may impact the existing FS for sediment and surface water, the existing risk assessment will not be revisited.

- Item 6 – NJDEP noted that the mercury level at SD-18 was higher than at other stream sediment locations but was not really a focus of the previous FS.
  Resolution: Mercury has not been identified as a constituent of concern with respect to SMC's operations at the Newfield facility and its presence at SD-18 is not thought to be attributable to SMC. It was agreed that the existing proposed resampling of location SD-18 will provide additional information on the potential presence of mercury at that location.

- Item 7 – EPA questioned the lack of analyses for other types of contaminants (e.g., volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), pesticides and PCBs).
  Resolutions: Section 3.1 has been revised to indicate that organic constituents were generally not detected during the original RI sampling efforts and, based on those results, subsequent investigations have focused on inorganic constituents.

- Item 8 – NJDEP encouraged the use of a second test species in the toxicity testing, noting that while no significant mortality was observed in previous tests using the midge *Chironomus tentans,* impacts on growth were observed. NJDEP also suggested that a shorter test duration could be adequate if a second test species is used.
  Resolution – TRC has revised Section 3.2.4 to reflect the use of both Hyalella azteca and Chironomus tentans for the toxicity testing. The test duration has also been reduced in accordance with NJDEP's comment.

TRC would like to conduct the sediment sampling activities described in this plan as soon as possible. Therefore, an expedited review of the revised sampling plan would be greatly appreciated.

If you have any questions or comments, please do not hesitate to call me at 860-298-6232.

Sincerely,

TRC ENVIRONMENTAL CORPORATION

Jean M Oliva

Jean M. Oliva
Senior Consulting Engineer

Enclosure

cc: Trevor Anderson, EPA (with 3 copies)
Steve Tappert, TRC (with 1 copy)
David Smith, SMC (with 1 copy)
Robert Smith, TRC